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**U.S. DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS, NEVADA**

* * *

10 SATHIRAWAT SAUBHAYANA)...CASE NO. 2:17-cv-02655-JAD-GWF
)...Agency No. 087 026 142
11 Plaintiff)
) UNOPPOSED MOTION TO EXTEND
12 vs.) TIME TO AMEND COMPLAINT
)
13 WILLIAM P. BARR, U.S. Attorney)
14 General, et al.,)
15 Defendants)
)
)

17 Plaintiff, Sathirawat Saubhayana, through his Counsel hereby moves to extend the time
18 for the filing of the amended complaint until April 16, 2020. This is the second extension of
19 time sought in this action with respect to the Defendants' motion to dismiss. The current filing
20 deadline is March 12, 2020. The requested extension of time is based on the following:

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1 1. This is a challenge to U.S. Citizenship and Immigration Services' ("USCIS")
2 decision to deny Plaintiff's application for naturalization. *See* 8 U.S.C. §1241(c).

3 2. Undersigned counsel requires additional time to file the amended complaint. Counsel
4 has various upcoming deadlines which require substantial preparation:

5 March 6, 2020	9 th Circuit Reply Brief
6 March 11, 2020	9 th Circuit Opening Brief
7 March 12, 2020	9 th Circuit Reply Brief
8 March 12, 2020	District Court Complaint
9 March 12, 2020	Response to Motion with 9 th Circuit
10 March 16, 2020	9 th Circuit Reply Brief
11 March 19, 2020	9 th Circuit Reply Brief
12 March 23-24, 2020	Attend and prepare for Oral Argument in San Francisco, California
13 March 25, 2020	9 th Circuit Opening Brief
14 March 31, 2020	Merits Hearing
15 April 1, 2020	Merits Hearing
16 April 6, 2020	Merits Hearing
17 April 9, 2020	Merits Hearing
18 April 15, 2020	Merits Hearing

19 3. Defendants, through counsel, indicated that they do not oppose this motion for an
20 extension of time, by email on March 2, 2020. To that end, Plaintiff requests an
21 additional 45 days to respond to the motion to dismiss, until April 16, 2020.

22 Respectfully submitted,

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24 /s/ Sylvia L. Esparza
Sylvia L. Esparza, Esq.
25 Attorney for Plaintiff

26 IT IS SO ORDERED.

27 
28 UNITED STATES MAGISTRATE JUDGE